

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
BLACKWELL PUBLISHING, INC.,)	
ELSEVIER, INC., ELSEVIER B.V.,)	
WALTER de GRUYTER GmbH & CO. KG,)	
MASSACHUSETTS MEDICAL SOCIETY,)	
WILEY-LISS, INC., and)	
WILEY PERIODICALS, INC.,)	
)	CIVIL ACTION NO. 04-10050-NG
Plaintiffs,)	
)	
v.)	
)	
FEDERAL STATE OF)	
NORDRHEIN-WESTFALEN, GERMANY,)	
d/b/a ZBMED,)	
)	
Defendant.)	
_____)	

JOINT MOTION TO AMEND SCHEDULING ORDER

The parties jointly move to amend the deadlines set out in the Scheduling Order entered by this Court at the Status Conference on July 23, 2004, as follows:

- March 4, 2005: All motions pursuant to Fed. R. Civ. P. 12, 15, 19, and 20 filed.
- June 17, 2005: All discovery on copies delivered into the United States completed.
- September 16, 2005: All dispositive motions pursuant to Fed. R. Civ. P. 56, with respect to copies delivered into the United States, filed.

As grounds for this motion, the parties state:

1. In their Joint Statement Pursuant to Local Rule 16.1(D), which was filed with the Court on July 17, 2004, the parties agreed to discovery deadlines and proposed deadlines for the filing of motions.

2. After a Status Conference on July 23, 2004, the Court (Bowler, M.J.) adopted the schedule proposed by the parties.

3. In light of progress made in ongoing settlement negotiations, the parties now seek to extend, by approximately two and a half months, the deadlines set out in that schedule.

4. Allowing the extended time periods set out in this motion will not prejudice any party or the Court, and will permit the parties to concentrate their energies on seeking to reach settlement.

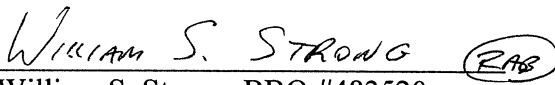
WHEREFORE, the undersigned parties respectfully request that the deadline for filing of motions pursuant to Fed. R. Civ. P. 12, 15, 19, and 20 be extended from Dec. 15, 2004, to March 4, 2005; that the deadline for discovery on copies delivered into the United States be extended from March 30, 2005, to June 17, 2005; and that the deadline

for filing of motions for summary judgment pursuant to Fed. R. Civ. P. 56, as to copies delivered into the United States, be extended from June 30, 2005, to Sept. 16, 2005.

Respectfully submitted,

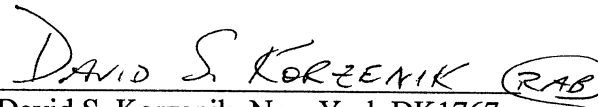
BLACKWELL PUBLISHING, INC.,
ELSEVIER, INC.,
ELSEVIER SCIENCE B.V.,
WALTER de GRUYTER GmbH & CO. KG,
WILEY-LISS, INC., and
WILEY PERIODICALS, INC.,
Plaintiffs

By their attorneys,

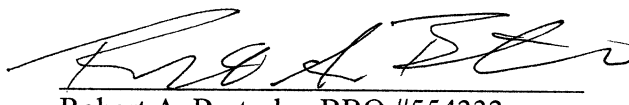

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FEDERAL STATE OF NORDRHEIN-
WESTFALEN, GERMANY, d/b/a
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Dated: November 23, 2004